



YERUN response to the Guidance on the Implementation of Plan S

YERUN welcomes the opportunity to give feedback on the [cOAlition S Guidance on the Implementation of Plan S](#), which follows our previous [position statement](#) published in October 2018. We support the aims and scope of Plan S to facilitate a swift transition to an open access publishing system that results in unrestricted and free access to, and reuse of research outputs, that are published and archived in Plan S compliant platforms and journals, with copyright retention for authors/and or institutions.

We agree that the transition will be a collaborative process among all key stakeholders. Effective engagement with key stakeholder groups and organisations and continued alignment will be vital to the successful implementation of Plan S, and to sustaining a fair, strong and vital research culture (including education, infrastructures, policies and evaluation mechanisms) that supports researchers at all stages of their careers. Particularly for early career researchers, it is important to make sure that incentives and assessment criteria are aligned with Plan S principles. YERUN is committed to working with cOAlition S and related stakeholders to advance on this.

Currently, the lack of transparency on costs and publishing agreements creates an environment which stifles true competition and inhibits innovation and development of services that truly reflect customer needs – researchers, institutions, funders. We agree on the need for full transparency on costs and contracts to foster the development of healthy, competitive services that meet customer requirements.

Finally, cOAlition S has outlined the key requirements for service providers to use and shape their products, and would urge cOAlition S to continually monitor the impact of new or revised business models and changing practices to avoid perpetuating existing faults in the scholarly publishing system or the creation of new ones. Attention should be paid to the impact on disciplines.

1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?

Plan S Compliance

- Stakeholders would benefit from further detail on the circumstances under which open access restrictions are acceptable to cOAlition S funders. We note that it will not be feasible to fully define these for alternative publishing innovation and business models still to be developed. Continuous communication and outreach is paramount. As

research is increasingly collaborative in an international research environment, we strongly recommend that cOAlition S funders' approach and policies on restrictions are aligned.

- It should be clear that the Open Access Repository route is a valid alternative provided it meets the specific conditions (section 10 of the guidance document). Easy recognition that a given OA Repository meets the conditions is encouraged.

Timeline

- As acknowledged in the guidance, it is not yet decided whether Plan S compliance will be required for outputs arising from existing grants, new projects/grants or new calls. A clear decision on the timeline should be made as quickly as possible.
- We recommend that Plan S compliance should apply to new projects and grants as the most realistic and balanced option for researchers and the aims of cOAlition S. It strikes a balance between the need to accelerate the transition to full and immediate open access and the concerns of researchers and organisations around the timeline and the readiness of the supporting publishing system, local policies and infrastructure.
- Complying with Plan S compliance for existing grants and projects is less feasible, as it would require a change to grant conditions and existing output dissemination plans. However, outputs arising from projects and grants which are out of scope are likely to comply by default once Research Performing Organisations have implemented Plan S.

Open Access Journals, Platforms and Repositories

- The guidance currently states that all articles should be deposited in an Open Access Repository, irrespective of publication route, suggesting that articles published via Open Access Journals and Platforms must also be deposited in an Open Access Repository. In order to avoid misunderstanding, the guidance should further clarify the route to Plan S compliance for pre-prints, peer reviewed versions and published materials, and any applicable exceptions.
- It is recognised that repository deposit supports the need of RPOs and RFOs to identify research outputs they have produced or funded, to aid reporting on research outcomes, productivity and return on investment. It also facilitates text and data mining without restriction. Researchers may be required to deposit in multiple repositories to meet RFO and RPO requirements. Duplication of effort should be minimised. We strongly encourage the development of harmonised policy framework and investment in shared technical infrastructure based on common standards.

Licensing and Rights

- There is scope for potential conflict and misunderstanding surrounding Open Access Repository archiving of content published via ‘Green or Gold routes. Many repositories apply CC-BY licences by default, however the licence which applies to archived materials can vary depending on the publishing agreement. Even where copyright in the content is retained by the author or institution, and a CC-BY licence applies, publishers retain typographical copyright, and can restrict use of publisher PDFs. It is important that publishing agreements also cross-license repositories to reuse typographical copyright as standard.
- Currently, the guidance refers to scholarly articles across all disciplines. It may not be clear to authors and institutions that even where a CC-BY 4.0 licence is applied to a work, that they will have moral rights that afford further protections, or what those moral rights entail. As Plan S will be applied in multiple legal jurisdictions, it is recommended that these additional protections are clearly defined by cOAlition S funders in their national / local policies and guidance.
- Equally, there is currently lack of certainty over the use of some types of third party content in scholarly publication, and on pressures to clear rights for third party content in order to publish under CC-BY licences. It is recommended therefore that there is legal guidance and/or good practice guidance to support the reuse of third party content in scholarly works which are openly published, irrespective of route. This could be achieved in combination via policy, legislation, or clarification of existing legal mechanisms.
- Additional rights clearance should not be required for third party scholarly content, including data, figures and illustrations, created by cOAlition S funded researchers.

2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

We welcome the intention of cOAlition S to establish mechanisms to identify and signal Plan S compliance, working with DOAJ and OpenDOAR, using existing technologies and infrastructure. A key barrier to full and immediate Open Access is that it requires a significant investment of time and resources to deliver as the supporting infrastructure is immature.

Plan S Compliance

- As authors normally initiate the publication process, it is essential for author/researchers and their institutions to be able to clearly and quickly identify whether the chosen Open Access Journal, Platform or Repository is Plan S compliant at the first point of contact, before entering into an agreement to publish or deposit.
- A mechanism whereby journals, platforms and repositories are able to automatically flag or display Plan S compliance status to the researcher would support decision making and limit the risk of non-compliant publication routes being selected for cOAlition S funded outputs.
- Mechanisms should also be capable of flagging and filtering Plan S compliant outputs at article level by funder and by RPO, in Journals, Platforms and Repositories. This could facilitate reporting on cOAlition S funded outputs and support the cOAlition S review of Plan S implementation in 2023.
- This mechanism would support individual funders, at national or local level, and additionally allow more granular signposting of compliance with individual funder and/institutional policies so that authors can make an informed choice without an additional administrative burden. Publishing platforms should develop and adopt mechanisms to immediately notify the affiliated RPO and RFO once an agreement to publish has been made with an author, based on affiliation, and automated deposit of the Version of Record (VoR) or Author Accepted Manuscript (AAM) in a relevant institution or funder Open Access Repository. Such mechanisms already exist, such as Jisc Publications Router¹, a tool to automatically populate institutional repositories with scholarly information and articles. Such tools could be further enhanced, and routine deployment should be encouraged to support a swift transition, and minimise the risk of non-compliance.
- It should be possible to display compliance flags for multiple authors and affiliations, as much research is collaborative.
- Publishing routes should clearly signpost where multiple steps or routes are required to achieve Plan S compliance.

¹ <https://pubrouter.jisc.ac.uk/>

Open Access Journals, Platforms and Repositories

- COAlition S should provide support for and encourage the enhancement and development of innovative and alternative publishing models, in alignment with Plan S principles. These should take into account the needs of different disciplines, standards and formats as well as those of RFOs and RPOs. In particular, we recommend that support is given to developing high quality fee free publishing mechanisms to support early career researchers and those with limited resources.

Compliance and sanctions

- Compliance monitoring and management is resource-intensive for researchers and organisations. Existing technical infrastructure (e.g. Persistent Identifiers (PIDs)), should be adopted to filter flagged outputs and transfer information between systems to streamline administration and improve interoperability and data flow.
- Any sanctions applied for non-compliance should be fair, consistent and applied with tolerance to support the positive adoption of Open Science principles and good practice. They should be explicitly communicated to grant signatories and researcher teams. While they can be a driver for immediate change, sanctions are not a substitute for a robust supporting infrastructure that is economically and administratively sustainable for researchers, funders and institutions.

Licensing and rights

- There is a risk that copyright retention by authors alone may not allow institutions sufficient rights to comply with funder Open Access requirements. A system of automatic cross-licensing of rights for funders and institutions should be in place at Plan S compliant institutions. This might be addressed in researcher employment contracts, and institutional copyright and intellectual property rights policy, for instance as proposed in the UKSCL open access policy mechanism².
- As new publishing models evolve, researchers need clear and reliable guidance on trusted, genuine Open Access Journals and Platforms, and on the appropriate licensing options to choose. Digital mechanisms for automatically identifying the appropriate choices based on author affiliation and funding streams should be built in to all publishing systems.

Preservation and curation

- We note the intention of cOAlition S to address other types of outputs in the future and acknowledgement of the role of repositories in showcasing collections of scholarly

² <http://ukscl.ac.uk/>

articles for dissemination and further research, but preservation issues have not been addressed. The guidance should also consider curatorship, and responsibilities for preserving digital scientific heritage, including the memory of the research process, and the roles of Open Access Repositories, Platforms and Journals.

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- *About YERUN* -

The Young European Research University Network (YERUN) is a cluster of highly-ranked young universities in Europe that strengthens and facilitates cooperation in the areas of scientific research, academic education and services which benefit society. In this context, YERUN members consider that adequate support to human capital is essential to foster the next generations of (European) researchers and innovators. Strong support for excellent early-career researchers is therefore a priority for all YERUN members.

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